

# EXHIBIT 1

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

08:32

FOR THE COUNTY OF SAN FRANCISCO

HONORABLE ETHAN P. SCHULMAN

DEPARTMENT 304

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COORDINATION PROCEEDING

CASE No. CJC-21-005188

SPECIAL TITLE [RULE 1550(b)]

In Re: Uber Rideshare Cases

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REPORTER'S TRANSCRIPT OF PROCEEDINGS

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FRIDAY, SEPTEMBER 19, 2025

OFFICIAL STENOGRAPHIC REPORTER PRO TEM:

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Job No. CS7570158

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1 count of the incidents. You can also see the number 14:13  
2 of rides that we're talking about. But really, I was 14:13  
3 interested in that rate. 14:13

4 And then I started looking at what was 14:13  
5 reported from the surveys of the transit authorities. 14:13

6 So San Francisco MTA, they are buses, you 14:13  
7 know, right around the courthouse. In their survey -- 14:14  
8 now, their question, have you experienced sexual 14:14  
9 assault or rape? Again, it's not the five categories 14:14  
10 from the taxonomy. That's just the question that they 14:14  
11 asked. The incident rate they got is that people -- 14:14  
12 nearly 3 percent of people responded they had; right? 14:14

13 And so when I just do an eyeball comparison 14:14  
14 of these incident rates between Uber and also what's 14:14  
15 happening in San Francisco MTA, the chances of 14:14  
16 experiencing sexual assault or rape is about 28,000 14:14  
17 times higher; right? 14:14

18 So this is something when -- it seems to me 14:14  
19 is such a gap and so informative about putting the 14:14  
20 rates, the Uber incident rates, in context that of 14:14  
21 course the survey is not the same as reporting -- 14:14

22 Q Well, that's what I want to talk to you 14:14  
23 about, Dr. Stodden -- 14:14

24 A Yeah. 14:14

25 Q -- because when Dr. Madigan was here, he had 14:14

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1 a lot of critiques about whether you could compare 14:15  
2 survey data with safety report data. And as I 14:15  
3 understand it, you share some of the critiques -- 14:15

4 A Yeah. 14:15

5 Q -- of trying to compare one to the other. 14:15  
6 Tell us a little bit about the limitations of trying 14:15  
7 to pair up these two data points. 14:15

8 A The first one is kind of obvious; right? 14:15  
9 It's different to be sitting on a bus or a train than 14:15  
10 it is an Uber car; right? You're in a different 14:15  
11 situation. 14:15

12 It's also different when you are sitting on 14:15  
13 the bus, and someone comes up to you and says, I'd 14:15  
14 really like to survey you about your experience with 14:15  
15 safety on this bus. That's different to, you're in an 14:15  
16 Uber and you have the app. Something is happening, 14:15  
17 and you can make your report; right? The setting is 14:15  
18 just a little bit different or even substantially 14:15  
19 different. 14:15

20 So to me, that's something that is meaningful 14:15  
21 in the way that the data are gathered for the 14:15  
22 comparison that I'm doing here. What's compelling to 14:16  
23 me is just the difference in safety that -- or even, 14:16  
24 like, experience of sexual assault or rape that's 14:16  
25 actually being reported. 14:16

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1           The differences are so big that it's -- 14:16  
2       there's some meaningful signal there; right? That it 14:16  
3       seems, like, useful to set some context for how safe 14:16  
4       riding Uber is versus how safe these various transit 14:16  
5       authority is. 14:16

6           It's not a perfect comparison; right? Riders 14:16  
7       didn't have an app. They weren't reporting in the 14:16  
8       same way, and so on. But it does give some 14:16  
9       background. It's the information that we have, and I 14:16  
10      found it compelling just because the differences are 14:16  
11      so great here. 14:16

12       Q    Doctor, can you read for us into the record 14:16  
13      the authority and the incident rate that was reported 14:16  
14      in surveys that asked for experience -- whether 14:16  
15      someone had experienced sexual assault or rape. 14:16

16       A    Yeah. So a number of the transit authorities 14:16  
17      used the same question. When they did their surveys 14:17  
18      in 2024, they said -- you know, they asked their 14:17  
19      survey respondents, Have you experienced sexual 14:17  
20      assault or rape? 14:17

21           The first one I mentioned, the San Francisco 14:17  
22      MTA, was 20 times -- 20,000 times higher rate. 14:17

23           So the next one is Orange County transit 14:17  
24      authority, and here, we see about 14,000 times higher. 14:17  
25      People are reporting that they experience sexual 14:17

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1 reported by the transit authority surveys. 14:18

2 The last two, Long Beach Transit, 14:18

3 .88 percent, 6,000 times higher. And then I think 14:18

4 it's Alameda County transit, .63 percent, a little 14:18

5 over 4,000 times higher rate, just reported by surveys 14:19

6 of the riders. 14:19

7 Q Would it have been ideal for you, 14:19

8 Dr. Stodden, if each one of these common carriers had 14:19

9 issued a safety report with the same taxonomy and 14:19

10 reporting categories as Uber so you could compare a 14:19

11 little closer apples to apples? 14:19

12 A That would be nice. 14:19

13 But I will say developing that taxonomy, 14:19

14 working with the relevant stakeholders, is not easy. 14:19

15 And here, what the law mandated was working with a 14:19

16 survey instrument developed at San Jose State, so 14:19

17 that's what they did. That's the question that was on 14:19

18 there. 14:19

19 I think it's also helpful that we got the -- 14:19

20 they did their surveys relatively quickly. Right? 14:19

21 They did it within a year, developing such a taxonomy, 14:19

22 and going through the auditing and classification, 14:19

23 building the data. 14:19

24 The quality and reliability that Uber did is 14:19

25 a more lengthy process. So that's another -- another 14:19

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1 thing here. 14:20

2 Q Is this the best data you had to look to to 14:20

3 try and figure out what the rates of sexual misconduct 14:20

4 and sexual assault are on common carriers? 14:20

5 A Yes. That's -- this is what I found. Right? 14:20

6 I didn't see anything else. 14:20

7 Q You also did a chart for us that -- that went 14:20

8 beyond the comparison on the top five categories, but 14:20

9 included all 21 categories. Tell you -- tell us why 14:20

10 you did that and what the results were. 14:20

11 A Yeah. So this is essentially a repeat of 14:20

12 what I just talked about. But what I'm trying to do 14:20

13 here is, let's give Dr. Madigan as many assumptions as 14:20

14 we possibly can, work within his assumptions, and see 14:20

15 where we land. 14:20

16 So here, what I did is I accepted 14:20

17 Dr. Madigan's metric of sexual malfeasance, right, 14:20

18 looking at all of the categories. Okay. 14:20

19 If we work from that -- those data and do the 14:20

20 comparison, the surveys don't have a question about 14:20

21 sexual misconduct as well as sexual assault. We just 14:21

22 kind of have what we have here: Did you experience 14:21

23 sexual assault or rape? 14:21

24 Doing that comparison, even taking all 14:21

25 21 categories for Uber into account, so Dr. Madigan's 14:21

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1 considering all of these categories, all 21 14:24  
2 categories, did you have the data to know, well, what 14:24  
3 was the rate of these incidents? 14:24

4 A Yeah. We had number of rides every year. 14:24  
5 Yeah. So calculating those rates is something we 14:24  
6 could do. 14:24

7 And in fact, Dr. Madigan did it. Those -- if 14:24  
8 you remember the red line in that Figure 1, those are 14:24  
9 rates over time that he calculated. 14:24

10 Q And does our last slide here, Doctor, contain 14:24  
11 the information that you were provided with and 14:24  
12 Dr. Madigan was provided with, even including all 14:24  
13 21 categories, the rates of reported sexual assault or 14:24  
14 sexual misconduct from 2017 to 2024? 14:24

15 A Yes. So these -- these -- so what's 14:24  
16 happening on this table is the numbers from the BART 14:24  
17 chart on the previous slide that's in the first column 14:25  
18 of 71,000. And that's all 21 categories, so 14:25  
19 Dr. Madigan's sexual malfeasance metric. 14:25

20 Here are the ride -- the rides information. 14:25  
21 And then we turned -- I turned it into rates here on 14:25  
22 the last column so that you can get a sense of what 14:25  
23 percent of rides had an incident -- or a sexual 14:25  
24 malfeasance incident over time. 14:25

25 Q And even considering all the limitations and 14:25



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1 the survey data and all the limitations on how that 14:25  
2 was collected, did you see rates anywhere near as low 14:25  
3 as these for the common carrier public transit 14:25  
4 authorities' reports of similar data? 14:25

5 A The rates didn't come close, notwithstanding 14:25  
6 there are differences between how the data are 14:25  
7 collected. But the rates didn't even come close. And 14:25  
8 I would say they would even swamp the differences in 14:25  
9 the data collection and still be a useful contextual 14:25  
10 clue about the safety on -- on Uber. 14:26

11 MS. BROWN: Thank you very much for your 14:26  
12 time, Dr. Stodden. Those are all the questions I have 14:26  
13 for you right now. I appreciate it. 14:26

14 MR. TAYLOR: Could we leave this exhibit up, 14:26  
15 please? 14:26

16 MS. BROWN: Sure. 14:26

17 MR. TAYLOR: We just had this handed to us 14:26  
18 this morning, and so I'd like to have access to it, if 14:26  
19 that's okay. 14:26

20 MS. BROWN: Of course. 14:26

21 MR. TAYLOR: Thank you very much. 14:26

22 THE COURT: Mr. Taylor, cross-examination. 14:26

23 MR. TAYLOR: Thank you very much. 14:26

24 Could we go back two slides, please. Even 14:26  
25 one more. That's it. 14:26

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1 State of California )  
 ) ss.  
2 County of San Francisco)  
3

4 I, ANDREA M. IGNACIO, Independent  
5 Stenographic Court Reporter contracted by the parties,  
6 at the Superior Court of California, County of  
7 San Francisco, do hereby certify:

8 That I was present at the time of the above  
9 proceedings;

10 That I took down in machine shorthand notes  
11 all proceedings had and testimony given;

12 That I thereafter transcribed said shorthand  
13 notes with the aid of a computer;

14 That the above and foregoing is a full, true,  
15 and correct transcription of said shorthand notes, and  
16 a full, true and correct transcript of all proceedings  
17 had and testimony taken;

18 That I am not a party to the action or  
19 related to a party or counsel;

20 That I have no financial or other interest in  
21 the outcome of the action.

22 Dated: 9-19-2025  
23

24 

25 ANDREA M. IGNACIO, RPR, CRR, CCRR, CLR, CSR No. 9830